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MAY 7 1993

FEDERAL COMMUNICATIONS COMMISSION
RE: RM-8218

FCC MAIL ROOM

THE PROPOSED RULE-MAKING RM-8218, SUBMITTED BY THE ARRL IS FLAWED IN THAT THEY FAIL TO ADDRESS SEMI-AUTOMATIC OPERATION..SPECIFICALLY ROVING MAILBOXES SUCH AS APLINK MBO'S. THIS OMISSION PLACES THE MBO'S IN THE SAME SUB-BAND ALLOCATION AS PACKET AUTO FORWARDING STATIONS. IF THIS WERE TO BECOME A REALITY, THE RESULT WOULD BE TOTAL CHAOS FOR THE DIGITAL COMMUNITY.

THE APLINK/DIGITAL STATIONS THAT PRESENTLY PROVIDE SERVICE TO KEYBOARDERS WOULD BE SEVERLY HAMPERED BY THIS RULEMAKING AS WOULD THE PACKET AUTO-FORWARD SYSTEM. ADDITIONALLY THE APLINK SYSTEM HAS BECOME A VIABLE PART OF THE NATIONAL TRAFFIC SYSTEM AND WITH THE DEVELOPMENT OF FACTOR AND CLOVER WILL INCREASE THE CAPABILITY OF THIS SYSTEM. HOWEVER IF THIS PROPOSED RULEMAKING WERE ALLOWED TO GO INTO EFFECT THE DEVELOPMENT OF DIGITAL MESSAGE HANDLING AND FORWARDING WILL BE SEVERLY HAMPERED. AS A SECTION TRAFFIC MANAGER AND OPERATOR OF AN NTS APLINK STATION I FEEL THAT THE RULE MAKING AS WRITTEN..OR IMPLIED IS NOT IN THE BEST INTEREST OF THE PUBLIC OR AMATEUR RADIO.

Earl Leach
EARL LEACH WX4J
STM NORTH FL.
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CERTIFICATE OF SERVICE

FCC MAIL ROOM

COPIES OF THIS LETTER HAVE BEEN MAILED TO ARRL HEADQUARTERS
AND EACH ARRL DIRECTOR

Earl E Leach

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WX4J